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May 21, 1996

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W.A. No. 52-3PL7

Mr. Eric Newman
U.S. EPA, Region III
841 Chestnut Street (3HW42)
Philadelphia, Pennsylvania 19107

Dear Eric:

Subject: Halby Chemical OU1 Expedited Response Action Oversight - Review of Witco's Monthly Progress Reports for 4/5/96 through 5/3/96

The work-plan supplement for the Halby OU1 Expedited Response Action (ERA) Oversight requires CH2M HILL to review the monthly progress reports prepared by Witco. Witco has prepared and submitted the reports to EPA approximately every 2 weeks. This letter provides a review of the progress reports for the period 4/5/96 through 5/3/96. The monthly technical status reports provided to EPA under the ARCS contract also describe CH2M HILL's activities on the project.

Progress Report - 4/5/96 through 4/19/96

During this period, Langan received non-validated laboratory analytical data on soil samples collected from the process plant drainage ditch for the treatability study and prepared summary tables of the results (tables 11 and 12 in the progress report); delivered non-validated analytical results to their data validator, Trillium, Inc.; completed the initial phase of data validation; began treatability testing of samples obtained from the process plant drainage ditch; continued preparing the Response Action Report and a letter report on waste classification; and interviewed potential subcontractors for future remedial activities. CH2M HILL performed no field oversight during this period.

Carbon disulfide concentrations ranged widely among the samples analyzed by the field GC (Table 11 in the progress report). Although some variability should be expected in soil, the wide range of results suggests that carbon disulfide was present in the soil samples as small, discrete, free-product masses. This is particularly true for test-pit locations TS-1 and TS-2,

which saw up to an order of magnitude difference in concentrations. The fact that concentrations of carbon disulfide in the corresponding samples analyzed in a fixed laboratory were nearly twice as high as the results obtained by the field GC is surprising, in that fixed laboratory results are typically lower because of loss by volatilization during handling and shipping. This argues for the field GC not being accurate.

Progress Report - 4/20/96 through 5/3/96

During this period, Langan received and tabulated non-validated laboratory analytical data on soil samples for the treatability study (Table 13 in the progress report); received several data packages from their data validator, Trillium, Inc.; continued to prepare the Response Action Report; continued to perform the treatability study; submitted a letter report to USEPA on waste classification; reviewed DNREC files on neighboring properties; and interviewed several potential subcontractors for future remedial activities. CH2M HILL did not perform field oversight during this period.

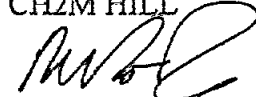
Carbon disulfide concentrations were measured in several samples selected from the soil submitted to ECD for the treatability study. These results are similar to those obtained by a fixed laboratory on samples sent directly from the field. This indicates that there was little or no loss of carbon disulfide during shipment of the samples to New Mexico and that the samples to be used for the treatability study are reasonably representative of the soil at the sampled locations.

Under "Planned Activities for the Next Reporting Period," Item 8 is "Continue preparation of waste classification report." It is unclear if this refers to the same report submitted on April 30.

Please call me at 703/471-6405, ext. 4324, with any questions regarding this review.

Sincerely,

CH2M HILL



Robert W. Root, Jr.
Site Manager

cc: Jane Biggs Sanger/DE DNREC